

1 DENNIS J. HERRERA, State Bar #139669
2 City Attorney
3 WAYNE SNODGRASS, State Bar #148137
4 CHRISTINE VAN AKEN, State Bar #241755
5 Deputy City Attorneys
6 1 Dr. Carlton B. Goodlett Place
7 City Hall, Room 234
8 San Francisco, California 94102-4682
9 Telephone: (415) 554-4633
10 Facsimile: (415) 554-4699
11 E-Mail: christine.van.aken@sfgov.org

12 Attorneys for Defendants
13 CITY AND COUNTY OF SAN FRANCISCO and
14 SAN FRANCISCO POLICE DEPARTMENT

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 DOUGLAS CHURCHILL, PETER LAU,
18 THE CALGUNS FOUNDATION, INC., THE
19 SECOND AMENDMENT FOUNDATION,
20 INC.,

Plaintiffs,

vs.

KAMALA HARRIS – as Attorney General,
CALIFORNIA DEPARTMENT OF JUSTICE,
CITY/COUNTY OF SAN FRANCISCO, and
SAN FRANCISCO POLICE DEPARTMENT,
CITY OF OAKLAND, OAKLAND POLICE
DEPARTMENT and Does 1 to 20,

Defendants.

Case No. C12-1740 LB

**STIPULATION AND [PROPOSED] ORDER
CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE**

Trial Date: None Set

1 The Case Management Conference is currently scheduled for Thursday, November 29, 2012 at
2 10:30 a.m. The parties request a continuance of the Case Management Conference to Thursday,
3 January 17, 2013 at 10:30 a.m., subject to the Court's availability, and with all remaining deadlines
4 associated with the initial case management conference similarly continued. There is good cause for
5 such a continuance. The Court is considering the California Department of Justice's motion to dismiss
6 this case for lack of jurisdiction and/or failure to state a cause of action, and the City and County of
7 San Francisco and plaintiffs are working diligently in an attempt to reach a settlement agreement. San
8 Francisco and plaintiffs are hopeful that they will be able to reach such an agreement, and have made
9 progress to that effect, but have not yet done so. Continuing the initial case management conference
10 would enable the parties to continue their settlement efforts while conserving judicial resources.

11 Accordingly, pursuant to Local Civil Rule 6-2, the parties who have appeared in this case
12 stipulate as follows:

13 1. Subject to the Court's approval, the Initial Case Management Conference shall be
14 continued to Thursday, January 17, 2013, at 10:30 a.m., or to a date shortly thereafter;

15 2. The last day to file the Case Management Statement, file the Rule 26(f) Report and
16 exchange initial disclosures shall be January 10, 2013.

18 Dated: November 20, 2012 By: **s/Donald E. J. Kilmer
19 Donald E. J. Kilmer, Jr.
Attorneys for Plaintiffs

21 Dated: November 20, 2012 By: **s/Daniel J. Powell
22 Daniel J. Powell
23 Attorneys for Defendants Kamala Harris and California
Department of Justice

24 Dated: November 20, 2012 By: s/Christine Van Aken
25 Christine Van Aken
26 Attorney for Defendants City and County of San
Francisco and San Francisco Police Department

27 **PURSUANT TO GO 45, THE ELECTRONIC SIGNATORY HAS
28 OBTAINED APPROVAL FROM THIS SIGNATORY.

[PROPOSED] ORDER
CONTINUING INITIAL CASE MANAGEMENT CONFERENCE AND RELATED
DEADLINES

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

**HONORABLE LAUREL BEELER
UNITED STATES DISTRICT JUDGE**